



Control Number: 49737



Item Number: 228

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**SOAH DOCKET NO. 473-19-6862
PUC DOCKET NO. 49737**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY AUTHORIZATION § OF
AND RELATED RELIEF FOR THE §
ACQUISITION OF WIND §
GENERATION FACILITIES § ADMINISTRATIVE HEARINGS**

2020 JAN 14 PM 2:53
PUBLIC UTILITY COMMISSION
FILING CLERK

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO TEXAS
INDUSTRIAL ENERGY CONSUMERS' THIRTEENTH REQUEST FOR INFORMATION**

JANUARY 14, 2020

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Question No. TIEC 13-1:

Referring to the Direct Testimony of Jay F. Godfrey, HSPM Exhibit JFG-5:

- a. Did SWEPCO or AEP obtain copies of the wind resource reports prepared by third-party wind consultants on behalf of Invenergy for the Traverse, Sundance, and Maverick projects? If so, please provide the wind resource reports. If not, please explain why not.
- b. Did SWEPCO or AEP obtain backcast studies from any of the wind consultants utilized by Invenergy to prepare wind reports for the Maverick, Sundance, or Traverse projects? If so, please provide the backcast studies. If not, please explain why not.

Response No. TIEC 13-1:

The information responsive to this request is HIGHLY SENSITIVE under the terms of the Protective Order. The Highly Sensitive information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15th Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

- a. Yes. Please see TIEC 13-1 Highly Sensitive Attachments 1 through 3.
- b. No. As stated in the testimony of Company witness Godfrey at page 23, the Companies, as part of the due diligence process, hired Simon Wind Inc. to independently review the wind resource assessments and the expected energy output included in the RFP proposals.

Prepared By: Joseph A. Karrasch
Prepared By: Edward J. Locigno

Title: Dir Renewable Energy Devlpmnt
Title: Regulatory Analysis & Case Mgr

Sponsored By: Jay F. Godfrey

Title: VP Energy Mktng & Renewables

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Question No. TIEC 13-2:

Referring to the Direct Testimony of Jay F. Godfrey at page 24, please state and provide a detailed explanation of the adjustments that Simon Wind made to Invenergy's expected annual energy projection for the Traverse, Sundance, and Maverick Projects. In responding, please provide all supporting documents and workpapers.

Response No. TIEC 13-2:

Please see Highly Sensitive Exhibit JFG-5 for the adjustments. Please see pages 1-11, 61-64, and 112-116 of Exhibit JFG-6 for explanations of the adjustments for the Selected Wind Facilities.

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